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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

18 UNITED STATES OF AMERICA,
19 Plaintiff,
20 v.
21 LINWEI DING,
22 Defendant.

Case No. 3:24-CR-00141-VC

**DECLARATION OF GRANT P. FONDO IN
SUPPORT OF DEFENDANT LINWEI DING'S
OPPOSITION TO UNITED STATES' MOTION
TO EXCLUDE EXPERT TESTIMONY OF
MARK ESKRIDGE**

Date: September 23, 2025
Time: 1:00 p.m.
Courtroom: 4 (17th Floor)
Judge: Hon. Vince Chhabria
450 Golden Gate Avenue
San Francisco, CA 94102

Filed/lodged concurrently herewith:

1. Opposition to United States' Motion to Exclude Expert Testimony of Mark Eskridge (Dkt. No. 149)

DECLARATION OF GRANT P. FONDO

I, Grant P. Fondo, declare as follows:

1. I am a partner at the law firm of Goodwin Procter LLP, counsel of record for Defendant Linwei Ding (“Mr. Ding”) in the above-captioned action (the “Action”). I make this declaration in support of Mr. Ding’s Opposition to the government’s Motion to Exclude Expert Testimony of Mark Eskridge (Dkt. No. 149).

2. I have personal knowledge of the matters stated in this declaration and, if called upon to do so, I could and would competently testify to the matters set forth herein.

3. Attached hereto as Exhibit A is a true and correct copy of an August 6, 2025 email from Casey Boome to Mr. Ding's counsel.

4. Attached hereto as **Exhibit B** is a true and correct copy of the August 26, 2025 expert disclosure of defense expert Mark Eskridge

5. Attached hereto as Exhibit C is a true and correct copy of August 26, 2025 expert disclosure of government expert Andrew Crain.

6. Attached hereto as **Exhibit D** is a true and correct copy of an FBI FD-302 Report produced at Bates No. US-0076809.

7. Attached hereto as **Exhibit E** is a true and correct copy of FBI FD-302 Report produced at Bates No. US-0002005.

8. On August 29, 2025, the government produced its 17th document production, which contained over 16,000 documents. On September 9, 2025—the final day of fact discovery—the government produced its 19th document production, which contained over 80,000 documents. Due to the large size of the 19th production (over 20GB), it took the defense team and its eDiscovery vendor four days to process the files to a point where they could be reasonably reviewed. On September 15, 2025, the government confirmed that most of the files in the 17th and 19th productions were reproductions of prior productions or produced copies of materials extracted from Mr. Ding’s devices.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed on
2 September 16, 2025 in Boston, Massachusetts.

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4 */s/ Grant P. Fondo*
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